



United States  
Department of  
Agriculture

Forest  
Service

Kootenai N.F.  
Libby Ranger District

Canoe Gulch Ranger Station  
12557 Highway 37 N  
Libby, Mt 59923

1225831 - R8 SDMS

File Code: 5130, 6700

Date: February 15, 2011

Route To:

Subject: Human Health Risk Assessment for Exposure to Libby Amphibole from Wildfire

To: Christina Progross, EPA Region 8, Project Manager-Libby Superfund OU3.

The Kootenai is very appreciative of the EPA efforts to date in conducting research on activities within OU3 as it applies to our management of the National Forest. I also very much appreciate the subsequent overview of the Libby Asbestos Superfund Site Operable Unit 3 – Initial Screening Level Human Health Risk Assessment for Exposure to Asbestos.

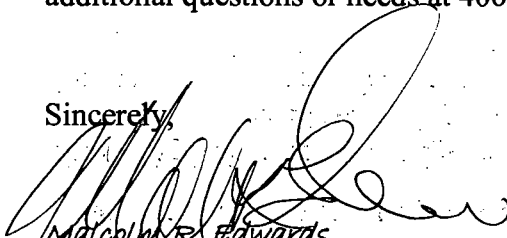
This letter is intended to express the need for a human health risk assessment for exposure to Libby Amphibole (LA) from the combustion processes during wildfires. Wildfires of varying magnitude will occur in OU3 and a risk assessment assessing exposure to possible LA is essential for informed decision making in regards to human safety and wildfire management.

The OU3 pile burning was originally planned for the fall of 2010, and would likely have provided some results regarding risks to firefighters, air support and the public prior to the 2011 fire season. Due to regulatory concerns and other issues, the burn was understandably not conducted. While the in-situ slash pile burning may not be feasible, we stand ready to cooperate with the EPA in securing further information relating to public and agency-personnel exposure to smoke in the OU3 area. Our concern is that it is difficult to understand how all the variables associated with the dynamics of a wildfire and smoke/particulate dispersion will be replicated in a small test-burn building. It is also uncertain to us how the test burn would apply to aircraft and crew during fire suppression activities.

I am hopeful that the EPA is still prepared to conduct real time air quality/smoke sampling at designated locations, with portable devices, and in aircraft during a wildfire event in OU3. At this time, the Forest will continue to implement current and approved safety mitigation measures during fire suppression activities, although the measures do significantly increase our costs.

Thank you for your continued work to develop information that will enable informed decision making by the Forest Service and our interagency partners. Please contact me with any additional questions or needs at 406-283-7598.

Sincerely,

  
Malcolm R. Edwards  
Libby District Ranger

